

DICKINSON, WRIGHT, MOON, VAN DUSEN & FREEMAN  
COUNSELLORS AT LAW  
800 FIRST NATIONAL BUILDING  
DETROIT, MICHIGAN 48226  
TELEPHONE (313) 223-3500

EPA Region 5 Records Ctr.



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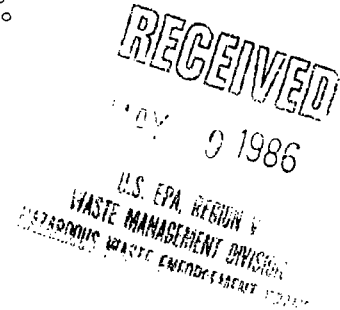
525 NORTH WOODWARD AVENUE  
P.O. BOX 509  
BLOOMFIELD HILLS, MICHIGAN 48303  
TELEPHONE (313) 646-4300

SUITE 801  
1901 L STREET, N.W.  
WASHINGTON, D.C. 20036  
TELEPHONE (202) 457-0160

SUITE 200  
215 SOUTH WASHINGTON SQUARE  
LANSING, MICHIGAN 48933  
TELEPHONE (517) 371-7300

HERBERT G. SPARROW, III

May 5, 1986



Ms. Janet Haff  
U.S. EPA - Region V  
Waste Management Division  
Hazardous Enforcement Branch  
CERCLA Enforcement Section  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: North Bronson Industrial Area  
Bronson, Michigan  
5HE-12

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Dear Madam:

We represent Bronson Specialties, Inc., and its Divisions including Bronson Plastics. We also represent Kuhlman Corporation. Each of these entities appears to be an addressee of a six-page EPA letter with respect to the captioned matter. That EPA letter, signed by Basil G. Constantelos as Director of your Waste Management Division, requested this reply to you.

Kuhlman through a wholly-owned subsidiary (Kuhl, Inc.) purchased certain of the assets of companies known as "Bronson Specialties, Inc.", and as "Bronson Products Co.", a wholly-owned subsidiary of Bronson Specialties, Inc., in 1979. These selling companies retained their charters, articles of incorporation, corporate minutes, and stock books and other like records. After this purchase, and pursuant to its right to do so, Kuhl Inc. changed its name to "Bronson Specialties, Inc."

Our investigation into the "North Bronson Industrial Area" situation shows the following:

1. None of the assets purchased or used by Kuhl, from the old Bronson Specialties, Inc., and Bronson Products Co., had been used in procedures which, to our understanding, did produce or can be claimed to have produced any part of the claimed industrial contamination.

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2. In connection with its purchase, Kuhl assumed specific liabilities of the old Bronson Specialties, Inc., and Bronson Products Co., such as accounts and notes payable, certain taxes, certain accrued expenses, certain deferred compensation obligations and certain long term debt. There was no express or implied assumption by Kuhl or by Kuhlman of any other liabilities, or of any sort of liabilities such as those which might arise out of the claimed contamination of the North Bronson Industrial Area.

3. None of the manufacturing or other activities carried on by Kuhlman and by its wholly-owned subsidiary Bronson Specialties, Inc., or any of its divisions, has to our understanding contributed in any way to the claimed industrial contamination.

Kuhlman (including its wholly-owned subsidiary Bronson Specialties, Inc., and the subsidiary's Bronson Plastics Division, and its former Bronson Products Division) is therefore unwilling to conduct or participate with other potentially responsible parties in the projected RI/FS for this property.

The real property which Kuhlman purchased in 1979 included property with street addresses at 404 Union Street and at 505 North Douglas Street, both in Bronson, Michigan. We are advised that the two six-page letters addressed to the Union Street address, together with the six-page letter addressed to the North Douglas Street address, together with the fourth EPA letter (which the EPA letter indicates was addressed to "Bronson Products Company, 304 North State Street, Bronson, Michigan 49028") were delivered to a post office box in the City of Bronson and were then and there signed for by Robert MacDonald, an employee of Bronson Specialties, Inc., assigned to its Tool Division. This arrangement is one of convenience arising out of these circumstances: in 1984, Bronson Specialties, Inc., carried on its business through three informal divisions, being the Tool Division, the Plastics Division, and the Products Division. From time to time, its Products Division was referred to as its Precision Products Division. In any event, in 1984, Bronson Specialties, Inc., sold the assets of its Products (or Precision Products) Division to another company which thereafter changed its name to "Bronson Precision Products, Inc." Bronson Precision Products, Inc., now leases the premises at 505 North Douglas Street from Bronson Specialties, Inc., but Bronson Specialties, Inc., continues to maintain some of its offices at the 505 North Douglas Street address.

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We are authorized to state in behalf of Bronson Precision Products, Inc., that it, like Kuhlman and like Bronson Specialties, Inc., declines for reasons here stated to participate in the projected RI/FS.

We nevertheless hope to attend the Chicago meeting on June 3, 1986. If we will not be able to attend this meeting, we shall telephone you at 312-886-6541.

Please direct all further correspondence concerning this situation to the undersigned, at the above address.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'H. G. Sparrow, III', with a stylized flourish at the end.

H. G. Sparrow, III

HGS:sa